



Your business
is our business.

REDACTED - FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 23, 2015

ACCEPTED/FILED

JUN 23 2015

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Federal Communications Commission
Office of the Secretary

Re: WC Docket No. 14-58
2015 ETC Annual Report of Dickey Rural Telephone Coop.
Study Area Code 381611

Dear Ms. Dortch:

On behalf of Dickey Rural Telephone Coop. ("Dickey"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Dickey seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd 0+3
List ABCDE

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124



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Federal Communications Commission
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Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 14-58
2015 ETC Annual Report of Dickey Rural Telephone Coop.
Study Area Code 381611
Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Dickey Rural Telephone Coop. ("Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan ("Progress Report") which is contained in the attachment to the 2015 Report.⁴
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ 47 C.F.R. §§ 54.313(a)(1).

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547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

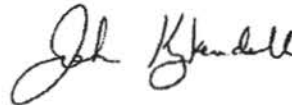
the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

| | | |
|---|--------------------------------|--|
| FCC Form 481 - Carrier Annual Reporting Data Collection Form | REDACTED FOR PUBLIC INSPECTION | FCC Form 481 (10-10 Control No. 2000-2000-2000-2000) July 2013 |
|---|--------------------------------|--|

| | | |
|---|------------------------------------|--|
| <010> Study Area Code | 381611 | ACCEPTED/FILED |
| <015> Study Area Name | DICKEY RURAL TELEPHONE COOPERATIVE | |
| <020> Program Year | 2016 | JUN 23 2015 |
| <030> Contact Name: Person USAC should contact with questions about this data | Troy Shilling | |
| <035> Contact Telephone Number: Number of the person identified in data line <030> | 7013446016 ext. | Federal Communications Commission Office of the Secretary |
| <039> Contact Email Address: Email of the person identified in data line <030> | teshilling@drtel.com | |

| |
|---|
| SECTION 2 - SERVICE QUALITY IMPROVEMENT REPORTING |
|---|

| | | | | |
|---------------------|---|---|---------------------------|-------------------------------------|
| <100> | Service Quality Improvement Reporting | (complete attached worksheet) | (check box when complete) | <input checked="" type="checkbox"/> |
| <200> | Outage Reporting (voice) | (complete attached worksheet) | | <input checked="" type="checkbox"/> |
| <210> | <input checked="" type="checkbox"/> K-- check box if no outages to report | | | <input checked="" type="checkbox"/> |
| <300> | Unfulfilled Service Requests (voice) | 0 | | <input checked="" type="checkbox"/> |
| <310> | Detail on Attempts (voice) | | | <input type="checkbox"/> |
| | | (attach descriptive document) | | |
| <320> | Unfulfilled Service Requests (broadband) | 0 | | <input checked="" type="checkbox"/> |
| <330> | Detail on Attempts (broadband) | | | <input type="checkbox"/> |
| | | (attach descriptive document) | | |
| <400> | Number of Complaints per 1,000 customers (voice) | | | |
| <410> | Fixed | 0.0 | | <input checked="" type="checkbox"/> |
| <420> | Mobile | 0.0 | | <input checked="" type="checkbox"/> |
| <430> | Number of Complaints per 1,000 customers (broadband) | | | |
| <440> | Fixed | 0.0 | | <input checked="" type="checkbox"/> |
| <450> | Mobile | 0.0 | | <input type="checkbox"/> |
| <500> | Service Quality Standards & Consumer Protection Rules Compliance | (check to indicate certification) | | <input checked="" type="checkbox"/> |
| <510> | 381611nd510.pdf | (attached descriptive document) | | <input checked="" type="checkbox"/> |
| <600> | Functionality in Emergency Situations | (check to indicate certification) | | <input checked="" type="checkbox"/> |
| <610> | 381611nd610.pdf | (attached descriptive document) | | <input checked="" type="checkbox"/> |
| <700> | Company Price Offerings (voice) | (complete attached worksheet) | | <input checked="" type="checkbox"/> |
| <710> | Company Price Offerings (broadband) | (complete attached worksheet) | | <input checked="" type="checkbox"/> |
| <800> | Operating Companies and Affiliates | (complete attached worksheet) | | <input checked="" type="checkbox"/> |
| <900> | Tribal Land Offerings (Y/N)? | (if yes, complete attached worksheet) | | <input checked="" type="checkbox"/> |
| <1000> | Voice Services Rate Comparability Certification | Yes | | <input checked="" type="checkbox"/> |
| <1010> | | (attach descriptive document) | | <input type="checkbox"/> |
| <1100> | Certify whether terrestrial backhaul options exist (Yes or No) | (if not, check to indicate certification) | | <input checked="" type="checkbox"/> |
| <1110> | | (complete attached worksheet) | | <input type="checkbox"/> |
| <1200> | Terms and Condition for Lifeline Customers | (complete attached worksheet) | | <input checked="" type="checkbox"/> |

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

| | | |
|---|-----------------------------------|-------------------------------------|
| <2000> | (check to indicate certification) | <input type="checkbox"/> |
| <2005> | (complete attached worksheet) | <input type="checkbox"/> |
| Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet | | |
| <3000> | (check to indicate certification) | <input checked="" type="checkbox"/> |
| <3005> | (complete attached worksheet) | <input checked="" type="checkbox"/> |

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|---|
| <010> | Study Area Code | 381611 |
| <015> | Study Area Name | DICKEY RURAL TELEPHONE COOPERATIVE |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Troy Shilling |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 7013446016 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tschilling@drtel.com |
| <110> | Has your company received its ETC certification from the FCC? | (yes / no) <input type="radio"/> <input checked="" type="radio"/> |
| | If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 | |
| <111> | year plan" filed with the FCC? | (yes / no) <input type="radio"/> <input type="radio"/> |

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

- <112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

381611nd112.docx

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

| |
|----------------|
| Yes |
| Yes |
| Yes |
| Yes |
| Yes |
| Not Applicable |

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

[illegible]

SPRINGER-VERLAGS GMBH, Central Mail No. 3060 0019

| | |
|----------|--|
| 1/1/2015 | |
|----------|--|

| | Residential Local Service Charge Effective Date | Single State-wide Residential Local Service Charge |
|-------|---|--|
| <701> | | |
| <702> | | |

[illegible]

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301611

DICKEY RURAL TELEPHONE COOPERATIVE

2016

Troy Shilling

7013446016 ext.

tschillingadrtel.com

472

[illegible]

Public Comment Period: 09-08-2016/OIG Control No.: 3060-0819

| | | |
|-------|---|--|
| <010> | Study Area Code | 381611 |
| <015> | Study Area Name | DICKEY RURAL TELEPHONE COOPERATIVE |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Troy Shilling |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 7013446016 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tschilling@drtel.com |
| <810> | Reporting Carrier | Dickey Rural Telephone Cooperative, Inc. |
| <811> | Holding Company | Dickey Rural Telephone Cooperative |
| <812> | Operating Company | Dickey Rural Telephone Cooperative, Inc. |

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

OMB Control No. 3060-0182 / OMB Control No. 3060-0819

| | | |
|-------|---|------------------------------------|
| <010> | Study Area Code | 381611 |
| <015> | Study Area Name | DICKEY RURAL TELEPHONE COOPERATIVE |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Troy Shilling |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 7013446016 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tachilling@drtel.com |

<910> Tribal Land(s) on which ETC Serves

Sisseton Wahpeton Oyate of the Lake Traverse Reservation

<920> Tribal Government Engagement Obligation

381611nd920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

| Select Yes or No or Not Applicable |
|--|
| Yes |
| Yes |
| Yes |
| Yes |
| Yes |
| Yes |
| Yes |
| Yes |
| Yes |

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

Form No. 3060-0815
June 2015

| | | |
|-------|---|------------------------------------|
| <010> | Study Area Code | 381611 |
| <015> | Study Area Name | DICKEY RURAL TELEPHONE COOPERATIVE |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Troy Shilling |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 7013446016 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tachilling@drtel.com |

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

**(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form**

PROCESSED
DATE: 08/01/2016, 10:00 AM
FILE NO. 1047-0334, ORA Control No. 3060-0819

| | | |
|-------|---|------------------------------------|
| <010> | Study Area Code | 381611 |
| <015> | Study Area Name | DICKEY RURAL TELEPHONE COOPERATIVE |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Troy Shilling |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 7013446016 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tschilling@drtel.com |

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP http://www.drtel.com/media/1047/2013_lifeline-poster.pdf

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

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(2000) Data of Mamm Caregiver Addressed Information

Data Collection Form

| | | |
|-------|---|------------------------------------|
| <010> | Study Area Code | 381611 |
| <015> | Study Area Name | DICKER RURAL TELEPHONE COOPERATIVE |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person (KAC) should contact regarding this data | TRCV 8b111102 |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 7013446916 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | trcv111102@trcvl.com |

CHECK the boxes below to note compliance on its five year service quality plan pursuant to 47 CFR § 54.313(h) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(h)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(h)(1))

| | |
|-------------------|--|
| 381611ind3010.pdf | Name of Attached Document Listing Required Information |
|-------------------|--|

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

☒

(3012) Community Anchor Institutions (47 CFR § 54.313(h)(ii))

| | |
|-------------------|--|
| 381611ind3012.pdf | Name of Attached Document Listing Required Information |
|-------------------|--|

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(h)(2))

(3014) If yes, does your company file the RUS annual report

☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(h)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☒

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☒

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

| | |
|-------------------|--|
| 381611ind3017.pdf | Name of Attached Document Listing Required Information |
|-------------------|--|

(3018) If the response is no on line 3014, is your company audited?

☐

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3025 pursuant to § 54.313(h)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☐

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(h)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers.

☐

(3023) Underlying information subjected to a review by an independent certified public accountant

☐

(3024) Underlying information subjected to an officer certification.

☐

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3026) Attach the worksheet listing required information

| | |
|--|--|
| | Name of Attached Document Listing Required Information |
|--|--|

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[3000] Rate Of Return Card: Additional Documentation (Continued)

Data Collection Form

| | |
|---|------------------------------------|
| <010> Study Area Code | 381611 |
| <015> Study Area Name | DICKEY RURAL TELEPHONE COOPERATIVE |
| <020> Program Year | 2016 |
| <030> Contact Name - Person USAC should contact regarding this data | Troy Shilling |
| <035> Contact Telephone Number - Number of person identified in data line <030> | 7013446016 ext. |
| <039> Contact Email Address - Email Address of person identified in data line <030> | tshilling@drtel.com |

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

| | | | | | | |
|-------------------|-----------------|-----------------|--------------|---|---|---|
| Reporting Carrier | Study Area Code | Study Area Name | Program Year | Contact Name - Person USAC should contact regarding this data | Contact Telephone Number - Number of person identified in data line <030> | Contact Email Address - Email Address of person identified in data line <030> |
|-------------------|-----------------|-----------------|--------------|---|---|---|

| | | |
|-------|---|------------------------------------|
| <010> | Study Area Code | 381611 |
| <015> | Study Area Name | DICKEY RURAL TELEPHONE COOPERATIVE |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Troy Shilling |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 7013446016 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tachilling@drtel.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

| | |
|---|--------------------------------|
| Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients | |
| I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. | |
| Name of Reporting Carrier: | |
| Signature of Authorized Officer: | Date |
| Printed name of Authorized Officer: | |
| Title or position of Authorized Officer: | |
| Telephone number of Authorized Officer: | |
| Study Area Code of Reporting Carrier: | Filing Due Date for this form: |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

| | | |
|--|--|--|
| Certification of Reporting Carrier Data Collection Form | | |
|--|--|--|

| | |
|---|------------------------------------|
| <010> Study Area Code | 381611 |
| <015> Study Area Name | DICKEY RURAL TELEPHONE COOPERATIVE |
| <020> Program Year | 2016 |
| <030> Contact Name - Person USAC should contact regarding this data | Troy Schilling |
| <035> Contact Telephone Number - Number of person identified in data line <030> | 7013446016 ext. |
| <039> Contact Email Address - Email Address of person identified in data line <030> | tschilling@drtel.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

| Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier | |
|--|------------------------------------|
| I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate. | |
| Name of Authorized Agent: | John Staurulakis, Inc. |
| Name of Reporting Carrier: | DICKEY RURAL TELEPHONE COOPERATIVE |
| Signature of Authorized Officer: | Date: <u>6/22/2015</u> |
| Printed name of Authorized Officer: | Troy Schilling |
| Title or position of Authorized Officer: | Financial Manager/CFO |
| Telephone number of Authorized Officer: | 7013446016 ext. |
| Study Area Code of Reporting Carrier: | 381611 |
| Filing Due Date for this form: | 07/01/2015 |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

TO BE COMPLETED BY THE AUTHORIZED AGENT:

| Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier | |
|--|------------------------------------|
| I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate. | |
| Name of Reporting Carrier: | DICKEY RURAL TELEPHONE COOPERATIVE |
| Name of Authorized Agent or Employee of Agent: | JSI |
| Signature of Authorized Agent or Employee of Agent: | Date: <u>06/16/2015</u> |
| Printed name of Authorized Agent or Employee of Agent: | Cassandra Heyne |
| Title or position of Authorized Agent or Employee of Agent: | Consultant |
| Telephone number of Authorized Agent or Employee of Agent: | 3014597590 ext. |
| Study Area Code of Reporting Carrier: | 381611 |
| Filing Due Date for this form: | 07/01/2015 |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

Attachments

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and
Progress Report**

ATTACHMENT REDACTED IN ENTIRETY

**Dickey Rural Telephone Cooperative's Demonstration of Compliance with
Applicable Service Quality Standards and Consumer Protection Rules**

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers."² The FCC found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."⁴

Dickey Rural Telephone Cooperative ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under federal law and, to a limited extent under North Dakota state law as a telecommunications carrier subject to North Dakota Public Service Commission regulation. These obligations include, but are not limited to, the following: (1) adherence to state requirements that the Company complies with consumer protection and service quality standards pursuant to North Dakota Administrative Code Article 69, including customer requests for lowest price

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("*2005 ETC Order*").

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

⁴ *Id.* at n. 72.

service alternatives (69-09-05-01), discontinuance of telecommunications services (69-09-05-02), deposits and guarantees (69-09-05-03); (2) truth-in-billing requirements, and (3) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

Dickey Rural Telephone Cooperative's Demonstration of Ability to Function in Emergency Situations

Dickey Rural Telephone Cooperative hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2)¹ and North Dakota Administrative Code 69-09-05-12. The Company's voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company's central office can maintain 8 hours, plus or minus 15 percent, of battery reserve rated for peak traffic load requirements, and a permanent auxiliary power unit is installed which can be delivered and connected within four hours. The Company has battery backup at all office locations and in its electronic equipment sites capable of running for a minimum of 8 hours, plus or minus 15 percent. Length of run time is determined by the equipment serving the area and the number of customers working out

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as the Company has access to fuel. The Company tests the batteries at least once per year.

(700) Price Offerings Including Voice Mail Data
Data Collection Form

100-443635

| | |
|----------|--|
| 1/1/2015 | |
|----------|--|

| | Residential Local Service Charge Effective Date | Single State-wide Residential Local Service Charge |
|-------|---|--|
| <701> | | |
| <702> | | |

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

PC-99-0487
 Criminal Justice Training Control No. 3000-0819

| | | |
|-------|---|------------------------------------|
| <010> | Study Area Code | 381611 |
| <015> | Study Area Name | DICKEY RURAL TELEPHONE COOPERATIVE |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Troy Shilling |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 7013446016 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tshilling@drtel.com |

[illegible]

REDACTED FOR PUBLIC INSPECTION

(800) Operating Companies

Data Collection Form

Form 3060-0819

| | | |
|-------|---|--|
| <010> | Study Area Code | 381611 |
| <015> | Study Area Name | DICKEY RURAL TELEPHONE COOPERATIVE |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Troy Shilling |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 7013446016 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | tshilling@drtel.com |
| <810> | Reporting Carrier | Dickey Rural Telephone Cooperative, Inc. |
| <811> | Holding Company | Dickey Rural Telephone Cooperative |
| <812> | Operating Company | Dickey Rural Telephone Cooperative, Inc. |

[illegible]



Dickey Rural Telephone Cooperative
Dickey Rural Services, Inc.

Via U.S. Mail, Return Receipt Requested

December 11, 2014

Robert Shepherd, Chairman
Sisseton-Wahpeton Oyate of the Lake Traverse Reservation
PO Box 509
Agency Village, SD 57262-0509

Dear Robert Shepherd:

Dickey Rural Networks ("DRN"), an independent telecommunications provider serving the rural southeastern North Dakota area, wishes to engage with the Sisseton Wahpeton Oyate Tribal government about broadband availability and opportunities on Tribally-owned lands within our service area. DRN has been providing telecommunications and broadband services to the northwest corner of the Lake Traverse Reservation in North Dakota 1996 and we are interested in learning about any additional telecommunications needs that your community may have.

In November 2011, the Federal Communications Commission (FCC) comprehensively reformed the Universal Service Fund (USF) which helps companies like DRN provide state-of-the-art communications services in high-cost and rural areas. Among the reforms, the FCC adopted a rule requiring Eligible Telecommunications Carriers who receive high-cost USF support to engage annually with Tribal leaders about broadband deployment on Tribally-owned lands and report on five specific outreach activities. In July 2012, the FCC's Office of Native Affairs Policy (ONAP) issued specific guidance on outreach and engagement activities between telecommunications providers and Tribal governments, which is why I am contacting you, as I did last year around this time.

DRN is pleased to inform you that our company provides high-speed fiber-to-the-home (FTTH) broadband to 100% of our service area, including any customers located on the Lake Traverse Reservation within our service area. DRN respectfully invites you and other leaders from the Sisseton Wahpeton Oyate government to discuss additional ways that we can meet your telecommunications and broadband needs. Specifically, DRN would like to discuss the following items:

- Needs assessment and deployment planning focused on anchor institutions (such as schools, libraries and health centers);
- Feasibility and sustainability planning;

- Marketing services in a culturally sensitive manner;
- Rights of way, permitting, facilities siting, environmental and cultural preservation processes;
- Compliance with Tribal business licensing requirements.

As DRN already provides broadband to 100% of its service area, we believe many of the items above will not require an extensive discussion. However, DRN is interested in learning whether your community has any specific broadband needs that our company may be able to meet, depending on the scope and scale of the project. For example, are there any needs such as distance learning or tele-medicine that DRN could help facilitate? We also want to make sure that we continue to respect your cultural heritage, property rights, business customs, and any other rules and procedures of your government.

DRN is a locally-owned company headquartered in Ellendale, ND, and we have been serving this area for over 60 years. We are dedicated to serving and employing members of our community and we want to ensure that the Sisseton-Wahpeton Oyate of the Lake Traverse Reservation are served as best as possible.

DRN extends this invitation to set up an in-person meeting or conference call with members of your Tribal government at your earliest convenience. Please contact Troy Schilling at Dickey Rural Networks. We look forward to discussing this important issue with you.

Sincerely,



Troy Schilling
Financial Manager
Dickey Rural Networks
701-344-5000

Dickey Rural Telephone Cooperative (SAC 381611)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Dickey Rural Telephone Cooperative hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

Dickey Rural Telephone Cooperative (SAC 381611)

**Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly
Began Providing Service**

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service. Dickey Rural Telephone Cooperative did not newly begin providing community anchor institutions with access to broadband service in calendar year 2014.